

My name is Chris Cieslak. I have held an amateur license since 1992, and an Extra Class license since 1993. I have also been involved in the design and marketing of technology for over 7 years.

Simply put, it is my opinion that requiring manufacturers to make their radio equipment field-repairable would be nothing short of an unqualified disaster for the Amateur Radio Service, Amateur Radio operators, and Amateur Radio manufacturers.

Mr. Leggett notes in his petition that the current method of assembling amateur equipment is "desirable from an economic standpoint." What Mr. Leggett does not address is the flip side of that-- that is, the economic effects of enacting his proposal. To comply with this, manufacturers would have to:

1. Completely re-engineer every single product.
2. Completely re-design every single manufacturing process.
3. Use lesser-available (and therefore more expensive) through-hole components, as opposed to the now-common surface mount devices.

These factors would practically drive every single manufacturer out of the market--and even if a manufacturer complied, the radio would be too expensive for all but the most affluent amateurs.

The petition states that it would improve amateurs' response in emergency situations. It would be hard to see how that would be the case if gear needed in such an emergency was much more difficult to come by.

For example, I have an inexpensive radio in my car that covers each amateur band from 160 meters to 440 MHz (minus the 222 band). It is tiny enough to fit under my seat. If this radio was built following the guidelines in this petition, not only would I not be able to afford it, it would be too large to fit in my car.

I, for one, think I make a much better emergency communicator when I have a radio in my car.

Mr. Leggett's proposals also make it more likely, rather than less likely, that equipment will need service. Handheld and mobile equipment susceptible to vibration and shock would become much less reliable if all integrated circuits were socketed (such connections can work loose over time, especially as the radio heats up and cools down.)

As for advancement of the radio art, this proposal is completely without merit. A computer owner does not have to know how a hard drive works to plug one into his PC, and an amateur radio operator would not need to know the nuances of a direct digital synthesis VFO in order to plug such a module in his radio.

If anything, such a proposal would lessen the amount of technical advancement, as gear would become so large and lacking in features that it would be a laughingstock when placed next to modern "professional" public service equipment.

For amateurs interested in building and testing their own equipment, there are many manufacturers who sell kits that in many cases rival commercial gear, if not in size and features, then in radio performance. No "consumer radio service" (as Mr. Leggett calls the modern-day amateur radio service) supports such a market, nor should it. Furthermore, these kits give the operator the

"hands-on experience" Mr. Leggett desires, making his petition superfluous in that regard.

In conclusion, for those wanting a reliable emergency communications system, simple before-the-fact planning can accomplish the goals Mr. Leggett sets. For those wanting hands-on experience in radio technology, there are already hundreds of kits, as well as thousands of published circuits, to choose from. For these reasons, I ask the Commission to deny this petition, as it is completely without merit.